FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY and CITY OF INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

Shorewood Packaging Corporation of Indiana
620 South Belmont Avenue
Indianapolis, Indiana 46221

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-13958-00107	
Issued by: Original Signed by John B. Chavez John B. Chavez, Administrator Office of Environmental Services	Issuance Date: 11-07-2003 Expiration Date: 11-07-2008

[326 IAC 2-8-4] [326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]
C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS

Printing Operations

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D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)
D.1.5 Hazardous Air Pollutants (HAPs)

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.6 Record Keeping Requirements
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SECTION D.2 FACILITY OPERATION CONDITIONS

Natural Gas Fired Boilers

D.2.1 Particulate Matter [326 IAC 6-2-2]
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Certification Form
Emergency Occurrence Form
Quarterly Report Forms
Quarterly Deviation and Compliance Monitoring Report Form

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) the City of Indianapolis, Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a lithographic printing operation.

Authorized Individual:	Regional Manager - Safety and Environment
Source Address:	620 South Belmont Avenue, Indianapolis, Indiana 46221
Mailing Address:	620 South Belmont Avenue, Indianapolis, Indiana 46221
General Source Phone:	(317) 635-7777
SIC Code:	2752
County Location:	Marion
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) one (1) Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press, installed in 1992, identified as M-1, with a maximum operating capacity of 13.41 million square inches per hour (MMin^2), exhausting at one (1) stack, identified as S1;

(b) one (1) Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press, installed in 1998, identified as M-2, with a maximum operating capacity of 22.44 million square inches per hour (MMin^2), exhausting at one (1) stack, identified as S4;

(c) one (1) Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press, installed in 2000, identified as M-3, with a maximum operating capacity of 13.41 million square inches per hour (MMin^2), exhausting at one (1) stack, identified as S2; and

(d) one (1) 50 inch Color Offset KBA Lithographic Press with a coater utilizing water based and UV cured coatings, installed in 2001, identified as P-10, with a maximum operating capacity of 28.70 million square inches per hour (MMin^2), exhausting at one (1) stack, identified as S3.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) one (1) natural gas fired boiler with a maximum heat input capacity of 6.695 MMBtu per hour, installed in 1972;

(2) one (1) natural gas fired boiler with a maximum heat input capacity of 2.76 MMBtu per hour, installed in 1972; and

(3) one (1) natural gas fired boiler with a maximum heat input capacity of 1.2 MMBtu per hour, installed in 1992.

(b) Vessels storing lubricating oils, hydraulic oil, machining oils, and machining fluids.

(c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(d) Machining where an aqueous cutting coolant continuously floods the machining interface.

(e) Cleaners and solvents characterized as follows:

1) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100^{o}F)

2) having a vapor pressure equal to or less than .7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees C (68 oF)

The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(f) Closed loop heating and cooling systems.

(g) Infrared curing equipment

(h) Exposure chamber (“tower”, “columns”), for curing of ultraviolet inks and ultraviolet coatings where heat is the intended discharge.

(i) Any of the following structural steel and bridge fabrication activities:

1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent

2) Using 80 tons or less of welding combustibles

(j) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(k) Heat exchanger cleaning and repair.

(l) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(m) Paved and unpaved roads and parking lots with public access.

(n) Blowdown for any of the following: sight glass; boilers; compressors; pumps; and cooling tower.

(o) Other activities and categories with PM/PM10 emissions below insignificant thresholds of five (5) pounds per hour or twenty-five (25) pounds per day, including: anti-offset powder usage at each press with maximum usage for all presses combined resulting in calculated potential particulate emissions of 0.6 pounds per hour and 14 pounds per day.

(p) Other activities and categories with VOC emissions below insignificant thresholds of 3 pounds per hour or 15 pounds per day, single HAP emissions greater than 1 pound per day but less than 5 pounds per day or 1 ton per year, and combination HAPs emissions greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year:

1) one (1) pre-press area, installed in 1971, identified as PA-1, used for photographing, film developing, and plate preparation for the printing operation; and

2) twelve (12) folders/gluers.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the OES to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

(a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the OES, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by the OES.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ, and the OES may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.9 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the OES on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and the OES may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, and the OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and the OES. IDEM, OAQ, and the OES, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and the OES, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

City of Indianapolis OES
Telephone No.: 317/327-2234
Facsimile No.: 317/327-2274

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ and the OES, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ and the OES, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ or the OES determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ or the OES, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ or the OES, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or the OES, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and the OES and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the OES on or before the date it is due.

(2) If IDEM, OAQ and the OES upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and the OES takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and the OES, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097
and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and the OES, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, the OES, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, the particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), the particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector be accredited is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and the OES, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and the OES, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, source most comply with the applicable requirements of 40 CFR 68.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

(a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the OES on or before the date it is due.

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or the OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or the OES within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the OES on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) one (1) Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press, installed in 1992, identified as M-1, with a maximum operating capacity of 13.41 million square inches per hour (MMin^2), exhausting at one (1) stack, identified as S1;
(b) one (1) Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press, installed in 1998, identified as M-2, with a maximum operating capacity of 22.44 million square inches per hour (MMin^2), exhausting at one (1) stack, identified as S4;
(c) one (1) Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press, installed in 2000, identified as M-3, with a maximum operating capacity of 13.41 million square inches per hour (MMin^2), exhausting at one (1) stack, identified as S2; and
(d) one (1) 50 inch Color Offset KBA Lithographic Press with a coater utilizing water based and UV cured coatings, installed in 2001, identified as P-10, with a maximum operating capacity of 28.70 million square inches per hour (MMin^2), exhausting at one (1) stack, identified as S3.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 2-8]

The amount of VOC delivered to the printing presses, identified as M1, M2, M3 and P10, plus the amount of VOC used for clean-up of the printing presses shall be limited such that VOC emissions from all presses are ninety-six (96) tons or less per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit shall satisfy the requirements of 326 IAC 2-8 (FESOP).

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The amount of VOC delivered to the printing presses, identified as M1, M2, M3 and P10, plus the amount of VOC used for clean-up of the printing presses shall be limited such that VOC emissions from each press is less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

(a) The amount of single HAP delivered to the printing presses identified as M1, M2, M3 and P10, plus the amount of single HAP used for clean-up of the printing press shall be limited such that single HAP emitted is less than 10 tons per twelve consecutive month period with compliance determined at the end of each month.

(b) The amount of combination of HAPs delivered to the printing presses identified as M1, M2, M3 and P10, plus the amount of combination of HAPs used for clean-up of the printing press shall be limited such that combination of HAPs emitted is less than 25 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with Conditions D.1.1 and D.1.2 for VOC emissions shall be determined within 30 days of the end of each month based on the total volatile organic compound for the most recent twelve (12) month period. The monthly VOC emissions shall be based on the monthly usage of VOC containing materials, percent weight of VOCs in materials used and shall assume a 95% VOC retention factor for inks used on the Non-heat Set Lithographic Presses.

D.1.5 Hazardous Air Pollutants (HAPs)

Compliance with Condition D.1.3 for single HAP and combination of HAPs emissions shall be determined within 30 days of the end of each month based on the total single HAP and combination of HAPs for the most recent twelve (12) month period. The monthly single HAP and combination of HAPs emissions shall be based on the monthly usage of HAP containing materials and the percent weight of HAPs in materials used.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.6 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.1, D.1.2 and D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each material and solvent used.

(2) The amount of material and solvent used less water on monthly basis;

(a) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(b) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The cleanup solvent usage for each month;

(4) The total VOC and HAP usage for each month; and

(5) The weight of VOCs and HAPs emitted (based on 95% VOC retention factor for inks used on the presses) for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2 and D.1.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: INSIGNIFICANT ACTIVITIES

(a) one (1) natural gas fired boiler with a maximum heat input capacity of 6.695 MMBtu per hour, installed in 1972;

(b) one (1) natural gas fired boiler with a maximum heat input capacity of 2.76 MMBtu per hour, installed in 1972; and

(c) one (1) natural gas fired boiler with a maximum heat input capacity of 1.2 MMBtu per hour, installed in 1992.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2(a) (Particulate Emission Limitations for Sources of Indirect Heating) when total source maximum operating capacity rating in MMBtu/hour (Q) is less than 10 MMBtu/hr, the PM emission rate shall not exceed 0.6 pounds per MMBtu heat input. Therefore, the PM emissions from the 6.695 MMBtu per hour boiler and the 2.760 MMBtu per hour boiler shall be limited to 0.6 pounds per MMBtu heat input.

D.2.2 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating) the particulate emissions from the 1.2 MMBtu/hr heat input boiler, installed in 1992 shall be limited to 0.59 pounds per MMBtu heat input based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = Pounds of particulate matter emitted per MMBtu heat input.
Q = Total source maximum operating capacity rating in MMBtu per hour.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Shorewood Packaging Corporation of Indiana
Source Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
Mailing Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP No.: F097-13958-00107

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
DATA COMPLIANCE
2700 South Belmont Avenue
Indianapolis, Indiana 46221
Phone:317-327-2234
Fax:317-327-2274

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Shorewood Packaging Corporation of Indiana
Source Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
Mailing Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP No.: F097-13958-00107

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
DATA COMPLIANCE

FESOP Quarterly Report

Source Name: Shorewood Packaging Corporation of Indiana
Source Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
Mailing Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP No.: F097-13958-00107
Facility: M-1, M-2, M-3, P-10
Parameter: VOC
Limit: 1) The amount of VOC delivered to the printing presses, identified as M1, M2, M3 and P10, plus the amount of VOC used for clean-up of the printing presses shall be limited such that VOC emissions from each press, based on 95% VOC retention factor for inks used on the presses, is less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.
2) The amount of VOC delivered to the printing presses, identified as M1, M2, M3 and P10, plus the amount of VOC used for clean-up of the printing presses shall be limited such that VOC emissions from all presses are ninety-six (96) tons or less per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit shall satisfy the requirements of 326 IAC 2-8 (FESOP).

YEAR: _____

Facility	Month	Column 1	Column 2	Column 1 + Column 2
		VOC Emissions	VOC Emissions	VOC Emissions
M-1	Month 1			
M-2				
M-3				
P-10				
M1, M2, M3 and P-10				
M-1	Month 2			
M-2				
M-3				
P-10				
M1, M2, M3 and P-10				
M-1	Month 3			
M-2				
M-3				
P-10				
M1, M2, M3 and P-10				

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____
Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
DATA COMPLIANCE

FESOP Quarterly Report

Source Name: Shorewood Packaging Corporation of Indiana
Source Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
Mailing Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP No.: F097-13958-00107
Facility: M-1, M-2, M-3, P-10
Parameter: Single HAP and Total HAPs
Limit: 1) The amount of single HAP delivered to the printing presses identified as M1, M2, M3 and P10, plus the amount of single HAP used for clean-up of the printing press shall be limited such that single HAP emitted is less than 10 tons per twelve consecutive month period with compliance determined at the end of each month. 2) The amount of combination of HAPs delivered to the printing presses identified as M1, M2, M3 and P10, plus the amount of combination of HAPs used for clean-up of the printing press shall be limited such that combination of HAPs emitted is less than 25 tons per twelve consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2	Column 3	Column 4	Column 3 + Column 4
	Single HAP This Month	Single HAP Previous 11 Months	Single HAP 12 Month Total	Combined HAPs This Month	Combined HAPs Previous 11 Months	Combined HAPs 12 Month Total
Month 1						
Month 2						
Month 3						

9 No deviation occurred in this quarter.
9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
DATA COMPLIANCE

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Shorewood Packaging Corporation of Indiana
Source Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
Mailing Address: 620 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP No.: F097-13958-00107

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ______________________________

Title/Position: ______________________________

Date: ______________________________

Phone: ______________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	**Shorewood Packaging Corporation of Indiana**
Source Location:	**620 South Belmont Avenue, Indianapolis, Indiana 46221**
County:	**Marion**
SIC Code:	**2752**
Operation Permit No.:	**F097-13958-00107**
Permit Reviewer:	**Linda Quigley/EVP**

The Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) have reviewed a FESOP renewal application from Shorewood Packaging Corporation of Indiana relating to the operation of a lithographic printing source. Shorewood Packaging Corporation of Indiana was issued FESOP (097-5450-00107) on December 11, 1996.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) one (1) Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press, installed in 1992, identified as M-1, with a maximum operating capacity of 13.41 million square inches per hour (MMin^2), exhausting at one (1) stack, identified as S1;

(b) one (1) Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press, installed in 1998, identified as M-2, with a maximum operating capacity of 22.44 million square inches per hour (MMin^2), exhausting at one (1) stack, identified as S4;

(c) one (1) Mitsubishi Sheet Fed Non-heat Set Offset Lithographic Press, installed in 2000, identified as M-3, with a maximum operating capacity of 13.41 million square inches per hour (MMin^2), exhausting at one (1) stack, identified as S2; and

(d) one (1) 50 inch Color Offset KBA Lithographic Press with a coater utilizing water based and UV cured coatings, installed in 2001, identified as P-10, with a maximum operating capacity of 28.70 million square inches per hour (MMin^2), exhausting at one (1) stack, identified as S3.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) one (1) natural gas fired boiler with a maximum heat input capacity of 6.695 MMBtu per hour, installed in 1972;

(2) one (1) natural gas fired boiler with a maximum heat input capacity of 2.76 MMBtu per hour, installed in 1972; and

(3) one (1) natural gas fired boiler with a maximum heat input capacity of 1.2 MMBtu per hour, installed in 1992.

(b) Vessels storing lubricating oils, hydraulic oil, machining oils, and machining fluids.

(c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(d) Machining where an aqueous cutting coolant continuously floods the machining interface.

(e) Cleaners and solvents characterized as follows:

1) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100^{o}F)

2) having a vapor pressure equal to or less than .7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees C (68 oF)

The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(f) Closed loop heating and cooling systems.

(g) Infrared curing equipment.

(h) Exposure chamber (“tower”, “columns”), for curing of ultraviolet inks and ultraviolet coatings where heat is the intended discharge.

(i) Any of the following structural steel and bridge fabrication activities:

1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent

2) Using 80 tons or less of welding combustibles

(j) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(k) Heat exchanger cleaning and repair.

(l) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(m) Paved and unpaved roads and parking lots with public access.

(n) Blowdown for any of the following: sight glass; boilers; compressors; pumps; and cooling tower.

(o) Other activities and categories with PM/PM10 emissions below insignificant thresholds of five (5) pounds per hour or twenty-five (25) pounds per day, including: anti-offset powder usage at each press with maximum usage for all presses combined resulting in calculated potential particulate emissions of 0.6 pounds per hour and 14 pounds per day.

(p) Other activities and categories with VOC emissions below insignificant thresholds of 3 pounds per hour or 15 pounds per day, single HAP emissions greater than 1 pound per day but less than 5 pounds per day or 1 ton per year, and combination HAPs emissions greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year:

1) one (1) pre-press area, installed in 1971, identified as PA-1, used for photographing, film developing, and plate preparation for the printing operation; and

2) twelve (12) folders/gluers.

Existing Approvals

(a) FESOP 097-5450-00107, issued on December 11, 1996;

(b) Significant Permit Modification, 097-9370, issued on March 6, 1998;

(c) Significant Permit Revision, 097-11766, issued on June 6, 2000; and

(d) Administrative Amendment, 097-12637, issued September 20, 2000.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been changed in this FESOP:

FESOP 097-5450-00107, issued on December 11, 1996;

A.3, Insignificant Activities, item (2) - Storage tanks with a capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

Reason not incorporated: The source has removed all storage tanks.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on February 23, 2001. Additional information was received on March 18, 2003.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 7).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	less than 100
PM-10	less than 100
SO_2	less than 100
VOC	greater than 100, less than 250
CO	less than 100
NO_x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
toluene	less than 10
ethylene glycol	less than 10
methylene chloride	less than 10
cumene	less than 10
xylene	less than 10
hydrochloric acid	less than 10
glycol ethers	less than 10
hexane	less than 10
hydroquinone	less than 10
hydroflouric acid	less than 10
TOTAL	less than 25

(a) The unrestricted potential emissions of volatile organic compounds (VOCs) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD applicability.

Potential to Emit After Issuance

The source, issued a FESOP on December 11, 1996, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F097-5450-00107; issued on December 11, 1996).

	Potential to Emit After Issuance (tons/year)							
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_X	Single HAP	Total HAPs
Printing Presses (M1, M2, M3, P10)	2.06	2.06	--	96.00	--	--	9.53 (glycol ether)	9.72
pre-press area (PA-1) and folders/gluers	0.00	0.00	--	3.52	--	--	0.25 (hexane)	0.51
natural gas combustion	0.09	0.35	0.03	0.26	3.92	4.67	0.10 (hexane)	0.10
Total PTE After Issuance	2.15	2.41	0.03	99.78	3.92	4.67	< 10.0	< 25.0

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO_2	maintenance
NO_2	attainment
Ozone	maintenance
CO	attainment
Lead	maintenance

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as maintenance for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Marion County has been classified as attainment, maintenance or unclassifiable for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Part 70 Permit Determination

This source is not subject to 326 IAC 2-7 (Part 70 Permit Program) requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is limited to less than 100 tons per year;

(b) a single hazardous air pollutant (HAP) is limited to less than 10 tons per year; and

(c) any combination of HAPs is limited to less than 25 tons/year.

This status is based on the information provided by the source.

Federal Rule Applicability

(a) The one boiler, installed in 1992, is not subject to New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc). This subpart applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (Btu/hr)) or less, but greater than or equal to 2.9 MW (10 million Btu/hr). The boiler has a maximum design heat input capacity of 1.2 million Btu per hour, less than 10 million Btu per hour, and therefore it is not subject to the requirements of this rule.

(b) The two (2) boilers, installed in 1972, are not subject to New Source Performance Standard, 326 IAC 12, (40 CFR 60.40, Subpart D). This subpart applies to each fossil-fuel-fired steam generating unit of more than 73 megawatts (MW) heat input rate (250 million Btu/hr) with construction, modification, or reconstruction commenced after August 17, 1971. The two (2) boilers have a maximum design heat input capacity of 6.695 MMBtu/hr and 2.76 MMBtu/hr, respectively, and therefore are not subject to the requirements of this rule.

(c) The five (5) printing presses are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart QQ), because the five (5) printing presses are not publication rotogravure printing presses.

(d) The five (5) printing presses are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63.820 - 63.831, Subpart KK, because the printing presses do not meet the definition of a Flexographic press or Flexographic print station.

(e) The five (5) printing presses are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Paper and Other Web (Surface Coating), 40 CFR 63.3280 (Subpart JJJJ). The provisions of this Subpart apply to each new and existing facility that is a major source of HAPs, as defined in 40 CFR 63.2, Subpart A, at which web coating lines are operated. The facilities at this source are not a major source of HAPs and do not perform web coating.

(f) The National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T) is not applicable to this source because a non-chlorinated solvent cold cleaner is used.

(g) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because it is not a major source of hazardous air pollutant (HAP) emissions (i.e., the source does not have the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs, after enforceable controls and/or limitations).

(h) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source. Such requirements apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:

(1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,

(2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and

(3) the unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to be classified as a Part 70 major source.

This source is a FESOP source and is not a major Part 70 source. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source constructed in 1972, with modifications in 1996, 1998, and 2000 is not considered a major source because it is not one of the 28 listed source categories and it has always maintained unrestricted potential emissions of less than 250 tons per year of any criteria pollutant. As a FESOP source the total input usage of VOC shall be limited to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) shall not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC and is located in Marion County. Pursuant to this rule, the owner/operator of the source must submit an emission statement for the source. The statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6 and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8).

326 IAC 2-8 (FESOP)

(a) The amount of VOC delivered to the printing presses identified as M1, M2, M3 and P10, plus the amount of VOC used for clean-up of the printing presses shall be limited such that VOC emitted is less than 96.00 tons per twelve consecutive month period with compliance determined at the end of each month.

(b) The amount of single HAP delivered to the printing presses identified as M1, M2, M3 and P10, plus the amount of single HAP used for clean-up of the printing press shall be limited such that single HAP emitted is less than 10 tons per twelve consecutive month period with compliance determined at the end of each month.

(c) The amount of combination of HAPs delivered to the printing presses identified as M1, M2, M3 and P10, plus the amount of combination of HAPs used for clean-up of the printing press shall be limited such that combination of HAPs emitted is less than 25 tons per twelve consecutive month period with compliance determined at the end of each month.

Note: At this time the source does not have the potential to emit single HAP or combination of HAPs of greater than 10 tons and 25 tons per twelve consecutive month period, respectively because it changed the type of inks and coatings it uses to those with less HAP content. However, the source requests that the HAP limitations remain in this FESOP renewal in order to maintain flexibility with the types of inks and coatings it uses.

These limits shall render the requirements of 326 IAC 2-7 (Part 70) not applicable.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1 (County Specific Particulate Matter Limitations)

Pursuant to 326 IAC 6-1-1 (Applicability), specifically listed sources or facilities, or sources or facilities not specifically listed but located in a listed county and having either a potential to emit (PTE) one hundred (100) tons per year (tpy) or more or actual emissions of ten (10) tpy or more of particulate matter (PM), are subject to the applicable limitation(s).

The source is located in Marion County which is a specifically listed county. The source and its facilities are not specifically listed at 326 IAC 6-1-12 and, therefore, these rules do not apply. The PTE of PM for the source is less than 100 tpy, and actual PM emissions are less than 10 tpy. Therefore, the requirements of 326 IAC 6-1 do not apply.

326 IAC 6-4-1 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4-1, this source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right of way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the PTE 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). This source does not have the potential to emit 10 tons per year of any HAP or 25 tons per year of the combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply.

326 IAC 6-2-2 (Particulate Emission Limitations for Sources of Indirect Heating)

The 6.695 MMBtu/hr boiler and 2.760 MMBtu/hr boiler, installed in 1972, are subject to the requirements of 326 IAC 6-2-2 because the boilers are indirect heaters and were existing and in operation before September 21, 1983. Pursuant to this rule, particulate emissions from the two boilers shall be limited by the following equation:

$$Pt = \frac{0.87}{Q^{0.16}}$$

Q = 6.695 + 2.760 = 9.455 MMBtu per hour

$$Pt = \frac{0.87}{9.455^{0.16}} = 0.607 \text{ lb/MMBtu}$$

The allowable particulate emission rate from the two (2) boilers rated at 6.695 MMBtu per hour and 2.760 MMBtu per hour, based on the above equation, is 0.607 pounds per MMBtu heat input. However, pursuant to 326 IAC 6-2-2(a), for Q less than 10 MMBtu/hr, the allowable PM emission rate shall not exceed 0.6 pounds per MMBtu heat input. Therefore, the allowable PM emission rate from the 6.695 MMBtu per hour boiler and the 2.760 MMBtu per hour boiler is 0.6 pounds per MMBtu heat input. Based on calculation (see page 6 of 7, Appendix A), the two (2) boilers have a potential PM emission rate of 0.06 pounds per MMBtu heat input, therefore, it will comply with 326 IAC 6-2-2.

326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating)

This rule establishes limitations for sources of indirect heating, receiving permits to construct on or after September 21, 1983. The natural gas fired boiler for this source, with a maximum heat input capacity of 1.2 million Btu per hour (MMBtu/hr), is subject 326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating specified in 326 IAC 6-2-1(d)), because it was installed in 1992, after the September 21, 1983 rule applicability date.

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the boiler, based on a total heat input rate of 1.2 MMBtu per hour, shall be limited to 0.59 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = Pounds of particulate matter emitted per MMBtu heat input.
Q = Total source maximum operating capacity rating in MMBtu per hour.
Q = 6.695 + 2.760 + 1.20 = 10.655 MMBtu/hr

$$Pt = \frac{1.09}{(10.655)^{0.26}} = 0.59 \text{ pound per MMBtu heat input.}$$

Based on calculation (see page 6 of 7, Appendix A), the particulate matter emission from the boiler is 0.06 pound per MMBtu heat input. Therefore, the boiler will comply with 326 IAC 6-2-4.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 40 CFR 52 Subpart P, and 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, or not exempt under 326 IAC 6-3-1(b) or (c), and which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. The spray powder operation as part of the four printing presses, identified as M1, M2, M3 and P10 and the trimmers (insignificant activity), are subject to this rule.

326 IAC 8-1-6 (New Facilities; general reduction requirements)

This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of 25 or more tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT). This source shall limit VOC emissions from each of the lithographic printing presses (M1, M2, M3 and P10) to less than 25.0 tons per twelve consecutive month period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

326 IAC 8-2-5 (Paper Coating Operations)

This rule applies to facilities that perform web coating of paper with 100% saturation of the web, constructed after July 1, 1990 and have actual VOC emissions of greater than fifteen (15) pounds per day. This rule does not apply to the four (4) lithographic printing presses because these units do not perform web coating or saturation processes.

326 IAC 8-5-5 (Graphic Arts Operations)

The four (4) printing presses are not subject to the requirements of this rule because they do not perform flexographic or rotogravure printing. Therefore, these facilities are not subject to the requirements of 326 IAC 8-5-5.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties, as well as to facilities commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source is not subject to this rule because VOC emissions are limited to less than 100 tons per year pursuant to 326 IAC 2-8 (FESOP).

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Marion County. Therefore, this rule is not applicable to this source.

326 IAC 20-18-1(Hazardous Air Pollutants, Printing and Publishing Operations)

This source is not subject to 326 IAC 20-18-1 (Printing and Publishing Operations) because the source does not contain flexographic or rotogravure presses.

Testing Requirements

There are no testing requirements applicable to this source. The source shall maintain records of VOC usage. The previous approvals issued to this source did not include any testing requirements.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, and OES, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance monitoring requirements specifically applicable to the facilities at this source.

Conclusion

The operation of this lithographic printing source shall be subject to the conditions of the attached proposed FESOP No.: F079-13958-00107.

Appendix A: Emission Calculations

Company Name: Shorewood Packaging Corporation of Indiana
Address City IN Zip: 620 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP: 079-13958-00107
Plt ID: 079-00107
Reviewer: Linda Quigley/EVP
Application Rec.: February 23, 2001

Uncontrolled Potential Emissions (tons/year)

Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Printing Operations Fountain Solution/Blanket Wash	Pre-press and Folders/Gluers	**TOTAL**
PM	0.09	2.06	0.00	2.15
PM10	0.35	2.06	0.00	2.41
SO2	0.03	0.00	0.00	0.03
NOx	4.67	0.00	0.00	4.67
VOC	0.26	114.88	3.52	118.66
CO	3.92	0.00	0.00	3.92
total HAPs	8.81E-02	9.72	0.51	10.32
worst case single HAP	8.40E-02	9.53	0.25	9.53
	hexane	glycol ether	hexane	
Total emissions based on rated capacity at 8,760 hours/year.				

Controlled Potential Emissions (tons/year)

Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Printing Operations Fountain Solution/Blanket Wash	Pre-press and Folders/Gluers	**TOTAL**
PM	0.09	2.06	0.00	2.15
PM10	0.35	2.06	0.00	2.41
SO2	0.03	0.00	0.00	0.03
NOx	4.67	0.00	0.00	4.67
VOC	0.26	96.00	3.52	99.78
CO	3.92	0.00	0.00	3.92
total HAPs	8.81E-02	9.72	0.51	10.32
worst case single HAP	8.40E-02	9.53	0.25	9.53
	hexane		hexane	
Total emissions based on rated capacity at 8,760 hours/year, after control.				

Appendix A: Emissions Calculations
Printing Press Operations

Company Name: Shorewood Packaging Corporation of Indiana
Address City IN Zip: 620 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP: 079-13958-00107
Plt ID: 079-00107
Reviewer: Linda Quigley/EVP
Application Rec.: February 23, 2001

THROUGHPUT				
Press ID	Max Sheets Per Hour	Max Image Size	MMin^2/Year	MMin^2/hr
M1	12000	40" x 27.94"	117482	13.41

PTE's for VOC's	Maximum Coverage* (lbs/MMin^2)	Weight % VOC**	Flash Off %	Throughput MMin^2/Year	Run Time %	EMISSIONS (TONS/YEAR)
Inks:	2.63	28.00%	5.00%	117482	39.10%	0.85
Coatings: (High Gloss UV Coating)	3.92	6.15%	100.00%	117482	39.10%	5.54

PTE's for HAP's	Maximum Coverage* (lbs/MMin^2)	Weight % HAP** Cobalt Compounds	Flash Off %	Throughput MMin^2/Year	Run Time %	EMISSIONS (TONS/YEAR)
Inks:	2.63	0.88%	5.00%	117482	39.10%	0.03
	2.63	Manganese Compounds 0.26%	5.00%	117482	39.10%	0.01

PTE PM-10	Maximum Coverage* (lbs/MMin^2)	Throughput MMin^2/Year			Run Time	EMISSIONS (TONS/YEAR)
Spray Powder	0.0165	117482			39.10%	0.38

THROUGHPUT				
Press ID	Max Sheets Per Hour	Max Image Size	MMin^2/Year	MMin^2/hr
M2	12000	51.19" x 36.53"	196571	22.44

PTE's for VOC's	Maximum Coverage* (lbs/MMin^2)	Weight % VOC**	Flash Off %	Throughput MMin^2/Year	Run Time %	EMISSIONS (TONS/YEAR)
Inks:	2.63	28.00%	5.00%	196571	36.58%	1.32
Coatings: (High Gloss UV Coating)	3.92	6.15%	100.00%	196571	36.58%	8.67

PTE's for HAP's	Maximum Coverage* (lbs/MMin^2)	Weight % HAP** Cobalt Compounds	Flash Off %	Throughput MMin^2/Year	Run Time %	EMISSIONS (TONS/YEAR)
Inks:	2.63	0.88%	5.00%	196571	36.58%	0.04
	2.63	Manganese Compounds 0.26%	5.00%	196571	36.58%	0.01

PTE PM-10	Maximum Coverage* (lbs/MMin^2)	Throughput MMin^2/Year			Run Time	EMISSIONS (TONS/YEAR)
Spray Powder	0.0165	196571			36.58%	0.59

THROUGHPUT				
Press ID	Max Sheets Per Hour	Max Image Size	MMin^2/Year	MMin^2/hr
M3	12000	40" x 27.94"	117482	13.41

PTE's for VOC's	Maximum Coverage* (lbs/MMin^2)	Weight % VOC**	Flash Off %	Throughput MMin^2/Year	Run Time %	EMISSIONS (TONS/YEAR)
Inks:	2.63	28.00%	5.00%	117482	26.23%	0.57
Coatings: (High Gloss UV Coating)	3.92	6.15%	100.00%	117482	26.23%	3.71

PTE's for HAP's	Maximum Coverage* (lbs/MMin^2)	Weight % HAP** Cobalt Compounds	Flash Off %	Throughput MMin^2/Year	Run Time %	EMISSIONS (TONS/YEAR)
Inks:	2.63	0.88%	5.00%	117482	26.23%	0.02
	2.63	Manganese Compounds 0.26%	5.00%	117482	26.23%	0.01

PTE PM-10	Maximum Coverage* (lbs/MMin^2)	Throughput MMin^2/Year			Run Time	EMISSIONS (TONS/YEAR)
Spray Powder	0.0165	117482			26.23%	0.25

Appendix A: Emissions Calculations
Printing Press Operations

Company Name: Shorewood Packaging Corporation of Indiana
Address City IN Zip: 620 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP: 079-13958-00107
Plt ID: 079-00107
Reviewer: Linda Quigley/EVP
Application Rec.: February 23, 2001

THROUGHPUT				
Press ID	Max Sheets Per Hour	Max Image Size	MMin^2/Year	MMin^2/hr
P10	15000	51.19" x 37.38"	251431	28.70

PTE's for VOC's	Maximum Coverage* (lbs/MMin^2)	Weight % VOC**	Flash Off %	Throughput MMin^2/Year	Run Time %	EMISSIONS (TONS/YEAR)
Inks:	2.63	28.00%	5.00%	251431	39.95%	1.85
Coatings: (High Gloss UV Coating)	3.92	6.15%	100.00%	251431	39.95%	12.11

PTE's for HAP's	Maximum Coverage* (lbs/MMin^2)	Weight % HAP**	Flash Off %	Throughput MMin^2/Year	Run Time %	EMISSIONS (TONS/YEAR)
Inks:	2.63	0.88% Cobalt Compounds	5.00%	251431	39.95%	0.06
	2.63	0.26% Manganese Compounds	5.00%	251431	39.95%	0.02

PTE PM-10	Maximum Coverage* (lbs/MMin^2)	Throughput MMin^2/Year	Run Time	EMISSIONS (TONS/YEAR)
Spray Powder	0.0165	251431	39.95%	0.83

TOTALS (Tons per year)

VOC:	34.61
HAP:	0.19
PM-10:	2.06

PTE's VOC's for Isopropyl Alcohol (Fountain Solution)

M1

Gallons IPA used in 2002*	Run Hours in 2002*	% Run Hours	Hourly IPA usage (gal/hr)	Density IPA (lbs/gal)	Weight % VOC	VOC (lb/hr)	VOC (tpy)
3377.55	2334.4	39.10%	0.57	6.5	99.00%	3.64	15.94

M2

Gallons IPA used in 2002*	Run Hours in 2002**	% Run Hours	Hourly IPA usage (gal/hr)	Density IPA (lbs/gal)	Weight % VOC	VOC (lb/hr)	VOC (tpy)
3218.6	2289	36.58%	0.51	6.5	99.00%	3.31	14.50

M3

Gallons IPA used in 2002*	Run Hours in 2002*	% Run Hours	Hourly IPA usage (gal/hr)	Density IPA (lbs/gal)	Weight % VOC	VOC (lb/hr)	VOC (tpy)
1466.3	1053	26.23%	0.37	6.5	99.00%	2.35	10.29

P10

Gallons IPA used in 2002*	Run Hours in 2002*	% Run Hours	Hourly IPA usage (gal/hr)	Density IPA (lbs/gal)	Weight % VOC	VOC (lb/hr)	VOC (tpy)
3522.75	2512.8	39.95%	0.56	6.5	99.00%	3.60	15.79

Isopropyl Alcohol Total VOC PTE: **56.52**

Appendix A: Emissions Calculations
Blanket Wash

Company Name: Shorewood Packaging Corporation of Indiana
Address City IN Zip: 620 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP: 079-13958-00107
Plt ID: 079-00107
Reviewer: Linda Quigley/EVP
Application Rec.: February 23, 2001

M1

Gallons BW used in 2002*	Maximum Wash Hours	% Wash-up Hours	BW Usage (gal/hr)	Density BW (lbs/gal)	Weight % VOC	VOC (lb/hr)	VOC (tpy)
984.5	475.3	7.96%	0.16	6.9	100.00%	1.14	4.98

M2

Gallons BW used in 2002*	Maximum Wash Hours		BW Usage (gal/hr)	Density BW (lbs/gal)	Weight % VOC	VOC (lb/hr)	VOC (tpy)
1211.65	595.4	9.51%	0.19	6.9	100.00%	1.34	5.85

M3

Gallons BW used in 2002*	Maximum Wash Hours		BW Usage (gal/hr)	Density BW (lbs/gal)	Weight % VOC	VOC (lb/hr)	VOC (tpy)
924.55	444.3	11.07%	0.23	6.9	100.00%	1.59	6.96

P10

Gallons BW used in 2002*	Maximum Wash Hours		BW Usage (gal/hr)	Density BW (lbs/gal)	Weight % VOC	VOC (lb/hr)	VOC (tpy)
1240.8	595.8	9.47%	0.20	6.9	100.00%	1.36	5.96

Blanket Wash Total VOC PTE: **23.75**

M1

Gallons BW used in 2002*	Maximum Wash Hours	% Wash-up Hours	Hourly BW usage (gallons)	Density BW (lbs/gal)	Weight % Glycol Ether	Glycol Ether (lb/hr)	Glycol Ether (tpy)
984.5	475.3	7.96%	0.16	6.9	40.10%	0.46	2.00

M2

Gallons BW used in 2002*	Maximum Wash Hours		Hourly BW usage (gallons)	Density BW (lbs/gal)	Weight % Glycol Ether	Glycol Ether (lb/hr)	Glycol Ether (tpy)
1211.65	595.4	9.51%	0.19	6.9	40.10%	0.54	2.35

M3

Gallons BW used in 2002*	Maximum Wash Hours		Hourly BW usage (gallons)	Density BW (lbs/gal)	Weight % Glycol Ether	Glycol Ether (lb/hr)	Glycol Ether (tpy)
924.55	444.3	11.07%	0.23	6.9	40.10%	0.64	2.79

P10

Gallons BW used in 2002*	Maximum Wash Hours		Hourly BW usage (gallons)	Density BW (lbs/gal)	Weight % Glycol Ether	Glycol Ether (lb/hr)	Glycol Ether (tpy)
1240.8	595.8	9.47%	0.20	6.9	40.10%	0.55	2.39

Blanket Wash Total HAP PTE: **9.53**

*Maximum hourly usage based on run-time data from 2002 operations as provided by the source.

Offset Lithographic Printing operations at the source can be broken down into four major catagories: Make Ready, Wash-up, Running Operations, and Downtim

Running Operations: Ink, Coating, and Spray Powder is applied to board during running operations. Fountain Solution is run through the press to enhance ink application to the board.
Wash-up: Takes place between different jobs on the press. Solvents/Blanket Washes applied to the press to clean inks and coatings from press.
Make Ready: All activities which take place to prep a press for Running Operations which include: changing blankets, hanging plates, loading fountains with inks, and setting sheet sizes. The press is operational, however only at a minimal rate. Short runs (50 - 300 sheets) are made periodically to check specs.
Downtime: Occurs on press during mechanical failures, planned preventive maintenance, waiting on material and training.

The following is a breakdown of hours for each category per press:

	M1	**M2**	**M3**	**P10**
Make Ready Hours:	27.35%	30.34%	33.71%	28.25%
Wash-up Hours:	7.96%	9.51%	11.07%	9.47%
Run Hours:	39.10%	36.58%	26.23%	39.95%
Downtime Hours:	25.59%	23.57%	28.99%	22.33%
	100.00%	100.00%	100.00%	100.00%

Appendix A: Emissions Calculations
Insignificant Activities
Company Name: Shorewood Packaging Corporation of Indiana
Address City IN Zip: 620 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP: 079-13958-00107
Plt ID: 079-00107
Reviewer: Linda Quigley/EVP
Application Rec.: February 23, 2001

Pre-press chemicals (developers, finishers, replenishers, etc) are replaced within Pre-press equipment on a timeline basis. For example…the Kodak Developer chemicals are changed on a weekly basis. Use of chemicals is not dependant on run-time of equipment, but set replacement time period for each chemical and each piece of equipment. Calculations are based on chemical use data projected for 8760 hours of operation.

Pre-press Area:

Solvents	Units	Used 2002	Used 2002 (converted to lbs)	VOC Content (lbs/gal or %)	HAP Glycol Ethers	HAP Methanol	HAP Hexane	HAP Hydroquinone	Hydrogen Flouride	VOC (TONS)	Glycol Ethers (TONS)	Methanol (TONS)	Hexane (TONS)	Hydroquinone (TONS)	Flouride (TONS)
Anchor Film Kleen (7065)	GL	65	370.5	5.7 lbs/gal	0%	0%	93%	0%	0%	0.1853			0.1723		
Anchor Diazo Film Kleen (7019)	GL	41		6.9 lbs/gal	0%	0%	0%	0%	0%	0.1415					
Colorlok Glass Cleaner	15 oz cans	85	83.07421875	2.06 lbs/gal	4%	0%	0%	0%	0%	0.0103	0.0017				
229 Image Remover	OZ	40		4.0 lbs/gal	0%	0%	0%	0%	0%	0.0006					
										0.3376	0.0017	0.0000	0.1723	0.0000	
Developers															
GN-5 Gum Negative Hand Finisher	GL	25	227	0	0%	1%	0%	0%	0%	0.0000		0.0011			
DN-5M Machine Developer	GL	310		0.59 lbs/gal	0%	0%	0%	0%	0%	0.0915					
Plate Pre-Bake Solution/P MX1591	GL	210		1.293 lbs/gal	0%	0%	0%	0%	0%	0.1358	0.0000				
ProTherm Concentrated Developer/Replenisher	GL	880	8060.8	0.386 lbs/gal	5%	0%	0%	0%	0%	0.1698					
Plate Finisher 850S	GL	195		1.018 lbs/gal	0%	0%	0%	0%	0%	0.0993					
Kodak RA 2000 Automix Developer Replenisher	GL	162	1713.96	1.686 lbs/gal	10%	0%	0%	10%	0%	0.1366	0.0857			0.0857	
Kodak 3000 Automatic Fixer and Replenisher	GL	73		1.652 lbs/gal	0%	0%	0%	0%	0%	0.0603					
Xtradel	6 oz bottles	21	8.2096875	3.75 lbs/gal	0%	0%	0%	0%	5%	0.0018					0.0002
3M Negative Color Proofing Machine Developer	GL	84		3.34 lbs/gal	0%	0%	0%	0%	0%	0.1403					
										0.0000					
										0.8353	0.0857	0.0011	0.0000	0.0857	0.0002

Total VOC	Run days in 2002	Run Hours 2002	PTE VOC (Tons)
1.1729	250	6000	1.71

Total HAP	Run days in 2002	Run Hours 2002	PTE HAP (Tons)
0.3467	250	6000	0.51

	VOC	Glycol Ethers	Methanol	Hexane	Hydroquinone	Hydrogen Flouride
TOTAL:	**1.1729**	0.0874	0.0011	0.1723	0.0857	0.0002

HAP TOTAL: **0.3467**

Total GE	Run days in 2002	Run Hours 2002	PTE (tpy)
0.0874	250	6000	0.13

Total Methanol	Run days in 2002	Run Hours 2002	PTE (tpy)
0.0011	250	6000	0.00

Total Hexane	Run days in 2002	Run Hours 2002	PTE (tpy)
0.1723	250	6000	0.25

Total Hydroquinone	Run days in 2002	Run Hours 2002	PTE (tpy)
0.0857	250	6000	0.13

Total Hydrogen Flouride	Run days in 2002	Run Hours 2002	PTE (tpy)
0.0002	250	6000	0.00

Folders/Gluers:	Run Hours 2002	adhesive used total	adhesive used lb/hr	potential hours	VOC content %	PTE VOC tpy
	22192	90085	4.06	105120	0.85	1.81

PTE based on use of worst case adhesive.

Q-Pack Machines and Sagoma: Q-Pack Machines and the Sagoma uses no materials which contain VOC's.
Coater: The coater uses no materials which contain VOC's.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: Shorewood Packaging Corporation of Indiana
Address City IN Zip: 620 South Belmont Avenue, Indianapolis, Indiana 46221
FESOP: 079-13958-00107
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Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
10.7	93.3

Heat input capacitiy consists of the following: one (1) boiler rated at 6.695 MMBtu/hr, one (1) boiler rated at 2.76 MMBtu/hr, and one (1) boiler rated at 1.2 MMBtu/hr.

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.09	0.35	0.03	4.67	0.26	3.92

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32
Note: The rating on the one (1) boiler rated at 1.2 MMBtu/hr is a best guess estimate by the source. Manufacturer data is not availabl

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 7 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: Shorewood Packaging Corporation of Indiana
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HAPs - Organics

	Benzene	ne	Formaldehyde	Hexane	Toluene	
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	9.800E-05	5.600E-05	3.500E-03	8.400E-02	1.587E-04	8.782E-02

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.333E-05	5.134E-05	6.534E-05	1.773E-05	9.800E-05	2.557E-04
						8.807E-02

Methodology is the same as page 6.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.